

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 21-40120

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

TYSON THILL,

Defendant.

The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

My name is Tyson Thill.

On or about between February 8, 2019, and July 28, 2021, I knowingly attempted to use a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct.

I downloaded an application called "Bluetooth Remote Camera" on my cellular phone. The app allowed me to use my phone to control the camera of another phone. I hid one of the cell phones in a bedroom for the purpose of taking photographs of a minor getting dressed. I intended for the hidden cell phone to take photos of the lascivious exhibition of the minor's pubic area. I knew the minor was 15 years old at the time I attempted to take photographs of her with a hidden cell phone.

I admit that the visual depictions would have been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, including by computer, because neither cell phone used was made in South Dakota.

All of my actions were in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

I further stipulate and agree that the following property was used or intended to be used in the commission of the offense described above:

1. a Rocket Fish hard drive, RF-PHD25;
2. a Samsung Galaxy Note 5 SM-N920V, serial number 238G90PF9MA, IMEI 990005892407058;
3. a Samsung Galaxy S21 Ultra, serial number G9980, IMEI 356544763892962; and
4. a Samsung Galaxy Note 9, serial number R5CR124QZ8W.

ALISON J. RAMSDELL
United States Attorney

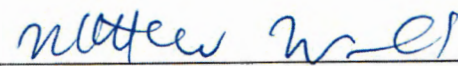
March 21, 2023
Date

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3/20/2023
Date


Tyson Thill
Defendant

3-20-2023
Date


Matthew M. Powers
Attorney for Defendant